

City Planning

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April 16, 2021

Planning Consultation
Provincial Planning Policy Branch
777 Bay Street, 13th floor
Toronto, ON
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Re: Consultation on Growing the size of the Greenbelt (ERO 019-3136)

On behalf of the City of Toronto, I am pleased to submit comments from City staff regarding ERO 019-3136 on the Environmental Registry of Ontario. We understand the Province is seeking feedback on ways to grow the size of the Greenbelt.

Where and How to Grow the Greenbelt

The Greenbelt enters the City of Toronto through the Protected Countryside in the Rouge Valley and through four tributaries which are designated as Urban River Valleys. The City of Toronto strongly supports the Greenbelt Plan and the permanent protection that it provides to ecological features and prime agricultural land. Toronto also supports expansion of the Greenbelt to protect other ecological and hydrological features such as the Paris Galt Moraine. Moraines are a critical water resource for the province, filtering and recharging groundwater and feeding the headwaters of rivers and streams, many of which ultimately flow to Lake Ontario, the source of drinking water for Torontonians and many other residents of Ontario.

The Province should consider expanding the Greenbelt to include other moraines and key ecological features and to protect additional prime agricultural lands. The Greater Toronto Area region is growing at an unprecedented rate. It is essential to protect key ecological features and functions and farmland before they are lost and can never be replaced. They are part of the larger bioregion that will ensure a healthy natural environment for future generations, while providing for compatible social and economic opportunities. The importance of these areas and the functions they provide and their contribution to our quality of life will only increase as the region gets denser. Additions to the Greenbelt Plan area should be supported by the Province through the necessary resources, incentives and other tools and, if necessary, through property acquisitions and easements. Further studies should be based on protection of the features and functions for the long term and should include consultation with affected municipalities, landowners, as well as stakeholders such as the Greenbelt Foundation and Indigenous Treaty holders.

Urban River Valleys in Toronto

The City of Toronto supports recognizing urban river valleys as important ecological and hydrological connections between the Greenbelt and Lake Ontario. One of the options under consideration through the 2021 Grow the Greenbelt consultation is to expand the Urban River Valley designation. The 2015 Greenbelt Plan recognizes Urban River Valleys by designating public land within 60m of the water line as Urban River Valley. The associated Urban River Valley policies found in section 6.0 of the Greenbelt Plan recognize the urban context of these lands through policies that permit infrastructure and encourage stewardship. The designation does not provide additional protection to the designated lands which are already designated as greenspace

in the Toronto Official Plan and protected through the zoning by-law and Conservation Authority Regulations. Since Toronto's urban river valleys are already recognized in the Greenbelt Plan, the benefit of expanding the designation, by increasing the offset or by adding additional parcels of land in Toronto, is not clear. Moreover, adding additional land area may raise expectations that it also provides additional protection.

We understand that the existing Urban River Valley policy framework is not proposed to be altered. We support this as, in its initial drafting, the City had concerns about how it could apply within the complex urban framework and ownership patterns that exist in the City's river valleys. We believe the current policy framework in the Greenbelt Plan properly and best protects these vital corridors as it recognizes the policy framework of Toronto's Official Plan. Further, we would like to confirm our understanding that any new infrastructure which falls within the Urban River Valley designation area is subject to Toronto's Official Plan policies which requires "alternative locations" to be examined and measures implemented to "protect, restore and enhance natural features" to the extent possible.

The existing Urban River Valley designation applies to the Keating Channel at the mouth of the Don River and to public lands within 60 m of the waterline. As part of the Port Land Flood Protection Project, a new naturalized river valley will be created at the mouth of the Don River (Attachment One). Should the Province be considering adjusting the Urban River Valley designation to reflect this new condition, City staff request the opportunity to work with the Provincial staff to ensure that the designation does not conflict with lands which may already be designated for development.

City Planning staff always welcome the opportunity to work with provincial staff to effectively implement the provincial policy led planning system, drawing on each of our strengths to protect essential ecological features and create sustainable, healthy complete communities.

Thank you for the opportunity to provide these comments. Please feel free to follow up with me directly or with Jane Weninger, Senior Planner at jane.weninger@toronto.ca



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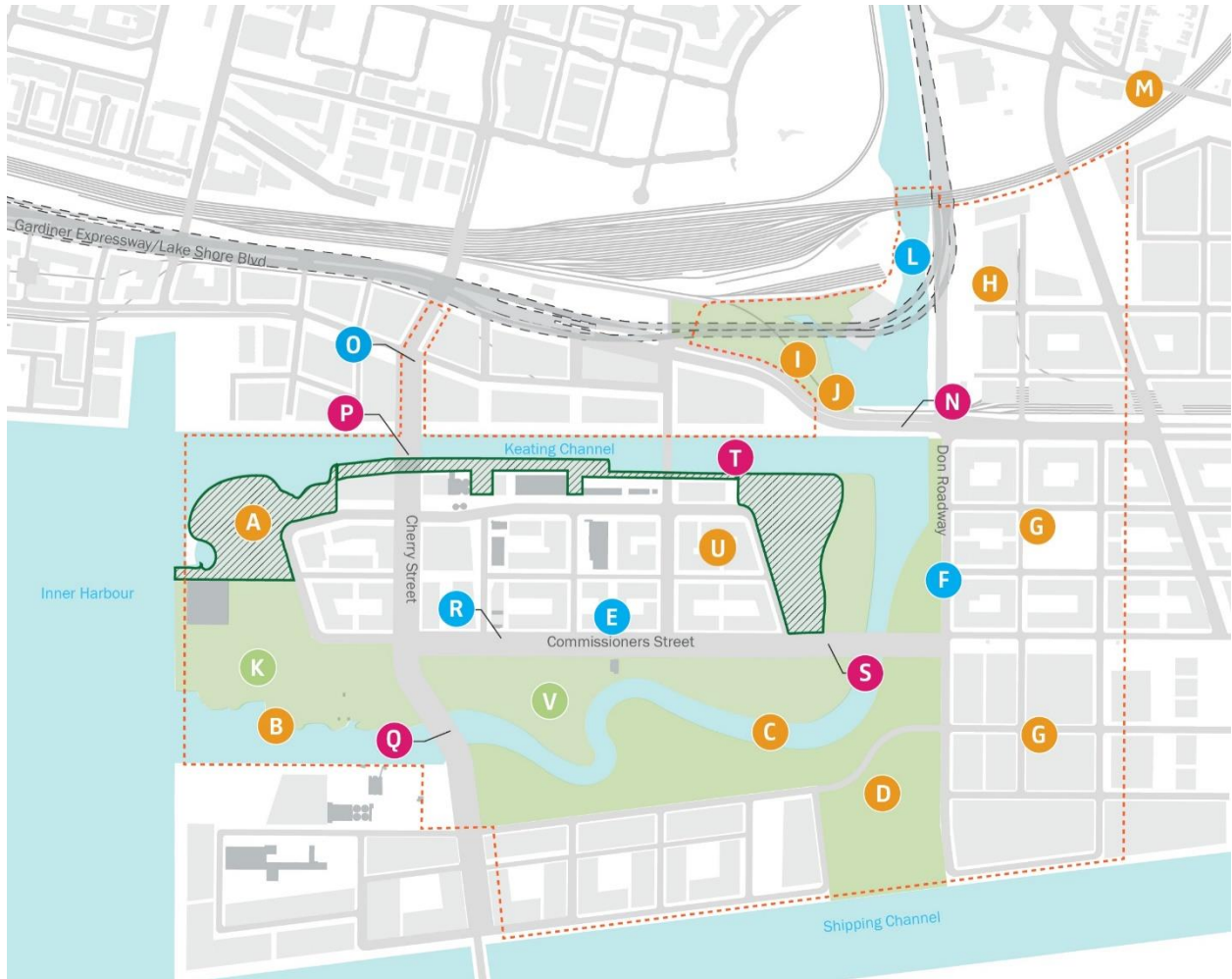
Cc:

Barbara Gray, General Manager, Transportation Services
Lou Di Gironimo, General Manager, Toronto Water
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Michael D'Andrea, Chief Engineer & Executive Director, Engineering & Construction Services
David Stonehouse, Director, Waterfront Secretariat
Paul Parsons, Senior Corporate Management Consultant, City manager's Office

Attachments

Attachment 1: Port Land Flood Protection Project

Attachment One: Port Land Flood Protection Project (<https://portlandsto.ca/project-map/>)



- LEGEND**
- Port Lands Flood Protection and Enabling Infrastructure Boundary
 - Parks (design)
 - Parks
 - Earthworks/Flood Protection
 - Bridges and Structures
 - Roads and Municipal Infrastructure